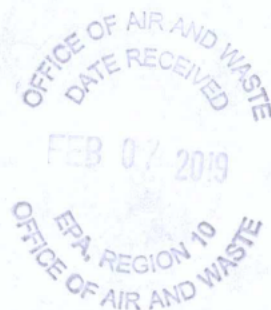




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January 31, 2019

Ms. Natalie Creed
Hazardous Waste Unit Manager
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706



RE: US Ecology Idaho (USEI) Site B – IDD073114654
January Monthly Progress Report on Recovery Actions Related to the November 17, 2018 Explosion at the USEI Site B Facility

Dear Ms. Creed:

As requested in IDEQ's letter dated December 18, 2018, USEI is hereby submitting the monthly progress report for January 2019. This report details the activities undertaken in the recovery process for the month of January.

Throughout the month of January, USEI has performed various operations to evaluate the facility and bring it back to a state of compliance. The actions taken in the month of January are outlined below.

Inspections – Inspections have been performed as required and documented; any area that could not be entered due to structural damage or due to other safety factors was noted on the inspection form.

Leachate Management – USEI has completed leachate inspections and removed accumulated leachate as required. Removed leachate has been filtered through the leachate treatment system and has been discharged to site surface impoundments for evaporation. Leachate levels for all areas, including those observed in the Evaporation Pond, continue to be in keeping with levels associated with normal operations.

Precipitation – Collected precipitation has been monitored and has been removed from container storage and RCRA tank areas as needed. All removed precipitation was discharged to the site surface impoundments for evaporation. All precipitation that could be safely removed from Pad 7 has been removed; a small amount of liquid remains in the subcells due to overhead hazards in the area. Once the remaining overhead hazards are removed the remainder of the water in the subcells will be removed.

Collected precipitation is continuing to be removed from the outdoor stabilization area and discharged to RCRA Tank #3 for storage, as needed. Accumulated precipitation in the collection



trenches in front of the Containment Building was removed on January 23, 2019 and was also discharged to Tank #3 for storage. The water is awaiting analysis. Once the liquid has been characterized, it will be appropriately managed, either through stabilization at the outdoor stabilization area or evaporation in one of the site surface impoundments.

On January 30, 2019 the sumps for Mix Bin #1 (MBT 1) were accessed for sampling. It was noted that the caps had been blown off both ports and that a large amount of water was present in both the primary and secondary sumps. The water level was not measured but was estimated to be approximately 18 inches deep. It has been determined that it is not safe for personnel to enter the area and pump the water from the sumps at this time.

Container Management – During the month of January container movements took place on January 18, 2019. The container movement document was submitted to Mr. Albert Crawshaw on January 21, 2019. The container movements were needed to clear space for containers that will be moved from Pad 7 to Pad 5 for storage, so that repairs to Pad 7 can begin.

Containers that were within the debris side of the Containment Building at the time of the incident remain there at this time. The building was released by OSHA on January 29, 2019. USEI will evaluate the building further and prepare a Safe Work Plan for removal of the containers prior to commencing work. USEI will provide IDEQ a copy of the Safe Work Plan once it has been finalized.

Treatment bins at the Outdoor Stabilization Facility that were in process at the time of the incident were covered on December 21, 2018. The in-process bins remain covered at this time. The bins are inspected on a daily basis and will be processed as operations at the facility resume.

Evidence Material – All of the tagged debris evidence remains in storage at Container Storage Area 1 (CSA 1) at this time. The empty drums from the back of the haul truck at the Containment Building were removed and the residue sampled on December 18, 2018. After sampling of the residues, the empty drums were moved to a secured storage container at CSA 1. The containers of burnt magnesium (WSID # 29857-0) and floor sweeps (WSID # 29853-0), were sampled on January 8, 2019 and were then placed in the area near the secured storage containers and evidence debris, and covered with a tarp which was secured to minimize the possibility that precipitation could infiltrate the containers. A chain-link fence was erected around the evidence materials on January 10, 2019.

The movement of the overpack drums of magnesium fines (the material involved in the explosion, WSID # 29856-0) from the area south of the Containment Building began Monday, January 28, 2019 and was completed Tuesday, January 29, 2019. The containers were moved to CSA 1 individually, each container was sampled, and then placed into storage in the secure fenced area at CSA 1. All remaining containers of magnesium material from Reade Manufacturing Company remain on site at this time. (b) (6), (b) (7)(A), (b) (7)(C)

[REDACTED], the timeframe for storage of these materials is unknown at this time.

The material remaining in MBT 1 was sampled on January 30, 2019. A remote sampling apparatus was fashioned so that personnel would not have to make a confined space entry or disturb the area with heavy equipment to obtain the sample. The liquid in the MBT 1 primary and secondary sumps was also sampled. All samples collected during the week were shipped for analysis on January 31, 2019.

Cleanup Material – Cleanup of non-evidence debris material continued through the first three weeks of January. Gathered tin and larger pieces of foam insulation have been placed into roll-off bins; small pieces of foam were bagged and then placed into roll-off bins. The bins were placed into storage at CSA 1. The majority of cleanup material outside the footprint of the Containment Building has been cleaned up at this time. Additional material will be cleaned up as it is identified. All cleanup material will be handled in accordance with the site closure plan.

A small amount of additional foam material was picked up in the desert on the south side of the facility during the first week of January. USEI will continue monitoring the area for additional material. No additional material was identified during the January inspection of the fence. USEI personnel will continue monitoring the fence line on a weekly basis to ensure material is not exiting the facility.

Facility Structures – At this time all facility structures have been evaluated by a contracted structural engineer for structural stability. The initial evaluation by the structural engineer was provided to IDEQ as part of the submittal of supplemental information provided on January 11, 2019.

Chain link fencing was installed around the Containment Building, the administration building complex, and the secured area in CSA 1 on January 10, 2019. Fencing from the secured area south of the Containment Building was moved to the area near the Field-Tech Office/firehouse on January 29, 2019 to enlarge the fenced area in front of the building.

Shoring activities for the administration complex were performed by USEI's contractor NorthStar. Removal of records and other items from the Women's Decon building were performed January 14, 2019. Shoring activities began on January 15 and were completed January 23, 2019. As buildings were shored, removal of overhead hazards such as loose ceiling tiles and light fixtures, and debris that had fallen to the floor was performed. All debris that was removed was placed in the building it came from or into adjacent buildings where there were no items to be recovered. Removal of the insulation material in the receiving office was performed using HEPA vacuums. All vacuumed material was placed into bags and placed in one of the empty offices. Removal of records and other items from buildings requiring shoring was performed January 18-23, 2019. Items removed from the buildings were placed into sea line containers for storage.

On January 21, 2019, the PCB Processing Building collapsed due to high wind speeds. The containers of waste material stored in the area were undamaged. On January 23, all containers were removed to a van trailer for shipment to the US Ecology facility located in Beatty, NV. Once all of the containers had been removed, the remaining walls and roof were pushed into the

footprint and covered with a tarp to eliminate precipitation run-on and run-off to the building footprint.

On January 22, 2019, USEI's contractor Paige Mechanical Group (PMG) recovered all of the coolant from each HVAC unit in the administration building complex.

The building where the Environmental Library was located is condemned and cannot be safely entered at this time. A plan will be formulated for removal of needed items once the roof has been removed from the building. Removal of the office buildings and decontamination trailers; field-tech office/firehouse; and the storage building by Pad 7/PCB Building have not been scheduled at this time. The field-tech office/firehouse building was determined to be unshorable. Entry into the field-tech office/firehouse building for retrieval of documents, equipment, supplies, etc. will be performed once the roof trusses have been removed to mitigate danger to personnel from collapse and/or overhead hazards. The storage building by Pad 7 /PCB Building will be picked up and moved with heavy equipment prior to removal/relocation of the supplies located in the area.

The Containment Building sustained major damage and will need to be repaired/rebuilt. An initial evaluation of the structure by the insurance company and a structural engineer were performed on the stabilization side of the Containment Building on January 29, 2019. Steel and other building debris will need to be removed before the slab and foundation can be further evaluated. The Debris Side will be evaluated once debris material and containers have been removed and the pad is visible for inspection.

The site vehicle wash building was removed January 8, 2019. Water to the truck wash area was restored on January 16, 2019. Up to January 16, a portable water source was needed to operate the pressure washer. A new building will be placed in the area in the coming weeks to house the pressure washer and protect the tank used to collect the wash water.

The site water system was partially evaluated/repared on January 16, 2019. One water tank is fully functional and is being used to supply water to the truck wash area. Broken lines at the administration/decon areas were capped during the evaluation and repair on January 16. Further evaluation of the remainder of the water tanks and water system piping are still needed.

Some buildings, such as Pad 7 and the new maintenance shop are structurally sound but will require a large amount of repair. Repairs on the new shop building began on January 21, 2019 and will continue until complete. The timeframe for repairs to Pad 7 is unknown at this time.

The Old Shop/Quonset hut was previously reported to be minimally damaged. The building was shored up by USEI's contractor NorthStar on January 16, 2019. The building was evaluated by USEI's insurance adjuster on January 29, 2019 and was determined to be a total loss. The building will continue to be used for storage of items until repairs to the New Shop are complete. Items will be removed to the New Shop once repairs are completed by USEI's contractor. Once items have been transferred back to the New Shop, a determination will be made about whether

to repair the Old Shop or rebuild it. At a minimum, the Old Shop wood framing will be removed and replaced.

Two portable structures to house scale operations and the fingerprint lab were brought to the site January 4, 2019; the scale house building and the scale were supplied with electricity on January 17, 2019. The scale house is located adjacent to the receiving scale. A decision was made to return the fingerprint lab building to the rental company and use the Outdoor Stabilization Facility office to house fingerprint lab activities in the near term. Repairs to the office at the Outdoor Stabilization Facility will be completed by February 1, 2019. A decision about the permanent location of the site laboratory will be made prior to restoring treatment operations at the facility.

A portable shower/toilet unit located in the temporary administration trailer area was put into service on January 10, 2019. The unit contains four separate shower/toilet/sink stations. An additional unit with two more restroom stations (toilet/sink only) is present in the area and will be hooked up when additional power is supplied to the area.

Facility Personnel – During the January 22, 2019 Update Conference Call, a list of current employees at the facility was requested. The list of employees is attached. Also included on the list are the employees that are no longer with the company.

If you have any questions regarding the content of this letter or require additional information, please call me or Rebecca Hogaboam at (208) 834-2275.

Regards,



Jason Evens
General Manager

cc: Barbara McCullough, EPA Region 10
Albert Crawshaw, IDEQ
Peter Purchase, IDEQ
Brian Gaber, IDEQ
Curt Ohlsen, IDEQ
Lon Stewart, IDEQ
Andrew Marshall, USE

Enclosure

USEI Transfer, Storage, Disposal Facility

Team Member	Title
BAILEY, NOEL	Technical Manager
BIRMINGHAM, JACK	Operations Supervisor
BYBEE, BRIGHAM	Sr Operator
CERECERES, TINO	Approvals Coordinator
CHRISTIANSEN, RICK	Sr Operator
CLARK, DAVID	Customer Service Specialist
CUTLER, ROBERT	Senior Operator
EVENS, JASON	General Manager
FERRELL, CASEY	Lead Operator - landfill
HALL, STEPHANIE	Chemist
HARLAN, RACHEL	Receiving Coordinator
HAZELL, LEE	Operator
HERRERA, FREDY	Operator
HOGABOAM, REBECCA	EH&S Compliance Manager
IRELAND, JOSEPH	Mechanic
JENSEN, JUSTIN	Rad Safety Specialist
KEENAN, EDWIN	Mechanic
LAWSON, AYL A	Receiving Coordinator
LAWSON, DEVANI	Lab Tech
LEONARD, CHET	Senior Operator
LINDQUIST, ROBERT	Mechanic Supervisor
LIVINGSTON, SOPHIE	Transportation Clerk
LUTRELL, JENNIFER	Customer Service Specialist
MAGERS, JUDITH	Office Administrator
MARTINEZ, DANIEL	Operations Supervisor
POLLARD, RICKEY	Operator
PROW, JACKIE	Lab Technician
RESNER, ROBERT	Operator
ROBERSON, KENNETH	Operation Manager
RODRIGUEZ, CYNTHIA	Receiving Coordinator
RODRIGUEZ, LAUREANO	Operator
ROGERS, BENJAMIN	Operator
SCHMITZ, CORIAN	Receiving Lead
SCHWAGER, ELIZABETH	HR Generalist
SIMPER, KARLITA	EH&S Compliance Specialist
VANCE, ROBERT	Lead Operator
WHITTED, DALE	Mechanic
WILSON, DANIEL	Senior Operator
WOODRUFF, DANE	Operator

USEI Rail Facility

	Team Member	Title
1	HASTINGS, JONNY	Mechanic
2	LOPES, JOAO	Operator
3	MONASERIO, JOSH	Lead Operator
4	MORENO, ANDREW	Operations Supervisor/ Rail Forman
5	SPENCER, JUSTIN	RTF Operations Supervisor
6	WININGS, ANDY	Operator

Team Members that have left the Company as of 1/30/2019:

	Team Member	Title
1	BEAVER, ESSIE	Operations Supervisor
2	BONECHER, BRENTON	Operator
3	DARKES, CASANDRA	Lab Technician
4	DESBIEEN, DARRIN	Operator
5	POSELEY, ZACHARY	Operator
6	RICHARDS, CODY	Operator
7	THEODOZIO, RICHARD	Sr. Operator
8	WHITEAR, BRIAN	Operator
9	WOODLAND, RONALD	Senior Operator